

FILED

IN THE DISTRICT COURT OF THE UNITED STATES SEP - 7 2006
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CLERK
U.S. DISTRICT COURT
MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA)

v.)

ALETHIA ADRIANNE SCOTT)
KEVIN ONEIL BROWN)

CR. NO. 2:06CR206-MHT

[18 U.S.C. § 371

18 U.S.C. § 641

18 U.S.C. § 2]

SUPERCEDING INDICTMENT

The Grand Jury charges:

INTRODUCTION

1. At all times relevant to this Indictment, the defendants, **ALETHIA ADRIANNE SCOTT** and **KEVIN ONEIL BROWN**, resided in the Middle District of Alabama. At times relevant to this Indictment both shared an apartment in Greenville, Alabama.

2. On or about September 29, 2005, Scott caused to be filed with the Federal Emergency Management Agency ("FEMA"), an agency within the United States Department of Homeland Security, an application for benefits in connection with Hurricane Katrina, which falsely represented that Scott had suffered losses to a trailer she owned as her primary residence in Stockton, Alabama. In fact, Scott did not reside in Stockton, did not own a trailer, and did not suffer the losses claimed.

3. FEMA accepted Scott's application and caused a series of United States Treasury checks in the amounts of \$12,708.00, \$2,208.00, \$315.46, and \$10,968.54,

respectively to be mailed to an address in Greenville, Alabama. Scott received each of the checks and cashed them.

4. At times relevant to this Indictment, Brown assisted in propagating this scheme and later benefitted from the proceeds of the scheme.

COUNT 1 – CONSPIRACY

THE CONSPIRACY AND ITS OBJECTS

5. From on or about September 29, 2005 through on or about March 31, 2006, the exact dates being unknown to the Grand Jury, in the Middle District of Alabama, and elsewhere, the defendants,

ALETHIA ADRIANNE SCOTT and KEVIN ONEIL BROWN,

did combine, conspire, confederate, and agree among themselves and each other to embezzle, steal, purloin, and knowingly convert to their own use money and things of value of the United States in an amount in excess of \$1,000, and to receive, conceal, and retain the same with the intent to convert it to their use and gain, knowing it to have been embezzled, stolen, purloined and converted, contrary to Title 18, United States Code, Section 641.

MANNER AND MEANS OF THE CONSPIRACY

6. It was part of the conspiracy that Scott and Brown agreed to create a scheme to receive and cash Hurricane Katrina disaster checks.

OVERT ACTS

7. In order to effect the object of the conspiracy, Scott did a number of overt acts, including:

- (a) filing the application for benefits with FEMA;
- (b) cashing the disaster assistance checks; and
- (c) sharing in the proceeds of the checks with Brown.

8. In order to effect the object of the conspiracy, Brown did a number of overt acts, including:

- (a) driving Scott to Stockton, Alabama in order to meet with a FEMA inspector;
- (b) assisting Scott in the cashing of disaster assistance checks; and
- (c) sharing in the proceeds of the checks with Scott.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-5 – THEFT OF GOVERNMENT PROPERTY

9. The allegations set forth in paragraphs 1 through 8 of Count 1 of this Indictment are hereby realleged as if set forth herein.

10. On or about the dates set forth below, in Butler County, within the Middle District of Alabama, and elsewhere,

**ALETHIA ADRIANNE SCOTT and
KEVIN ONEIL BROWN,**

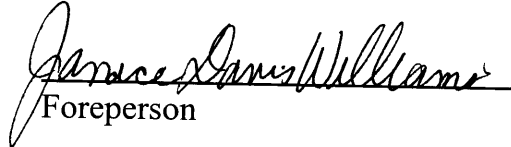
did, while aiding and abetting and while being aided and abetted by each other, embezzle, steal, purloin, and knowingly convert to their own use money and things of value of the


United States and of a department and agency thereof, in an amount in excess of \$1,000, as described below:

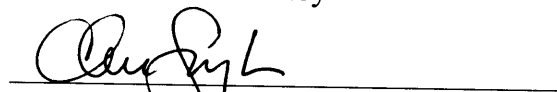
COUNT	DATE	ITEM
2	October 12, 2005	FEMA disaster assistance funds in the amount of \$12,708.00.
3	January 24, 2006	FEMA disaster assistance funds in the amount of \$2,208.00.
4	February 27, 2006	FEMA disaster assistance funds in the amount of \$315.46.
5	March 31, 2006	FEMA disaster assistance funds in the amount of \$10,968.54.

All in violation of Title 18, United States Code, Section 641 and 2.

A TRUE BILL:


Foreperson


LEURA G. CANARY
United States Attorney


CHRISTOPHER A. SNYDER
Assistant United States Attorney